

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Jiangmen Anotech Cookware Manufacturing Co., Ltd.

CERTIFICATE NUMBER
282

ASI STANDARD
PERFORMANCE
STANDARD
(V3 2022)

CERTIFICATION
LEVEL
FULL
CERTIFICATION

ASI ACCREDITED
AUDITING FIRM
BUREAU VERITAS
CERTIFICATION

DATE OF ISSUE
4 JULY 2023

DATE OF EXPIRY
3 JULY 2026

CERTIFIED SINCE
4 JULY 2023

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. Stewardship', with a long horizontal line extending to the right.

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*Validity of this Certificate is subject to
continued conformance with the
applicable ASI Standard and can be
verified at
www.aluminium-stewardship.org*

CERTIFICATION SCOPE

Manufacturing of cookware
containing aluminium at the
Jiangmen Anotech Cookware
Manufacturing Co., Ltd. (China).

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	The Cookware Company Ltd
ENTITY NAME	Jiangmen Anotech Cookware Manufacturing Co., Ltd.
CERTIFICATION SCOPE	Manufacturing of cookware containing aluminium at the Jiangmen Anotech Cookware Manufacturing Co., Ltd. (China).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Semi-Fabrication
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V3
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit
AUDIT FIRM	Bureau Veritas Certification
AUDIT DATE	<ul style="list-style-type: none">20 February – 1 March 2023
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">10 January 2023
AUDIT SCOPE	<p>The audit scope covers the Jiangmen Anotech Cookware Manufacturing Co., Ltd. production plant.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Semi-Fabrication <p>All applicable criteria in the ASI Performance Standard were included in the audit scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">Certification
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.<input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.<input checked="" type="checkbox"/> The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.<input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
CERTIFICATION PERIOD	4 July 2023 – 3 July 2026
NEXT AUDIT TYPE	Surveillance Audit

NEXT AUDIT DATE

3 January 2025

CERTIFICATE NUMBER

282



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EthicsPoint is a comprehensive and confidential reporting tool that enables complaints to be securely raised, managed and responded to. This enables anonymity to be maintained where desired by complainants, or as relevant to whistleblowing situations.

Information is available in five languages – English, French, Chinese, German and Portuguese (Brazil). Translation services provided by EthicsPoint enable complaints and correspondence to be managed in multiple languages.

ENTITY OVERVIEW

Jiangmen Anotech Cookware Manufacturing Co, Ltd. was established in 2004 and is a professional manufacturer of cookware products. The main processes include deep drawing/forging, polishing, gritting and hard anodization of Aluminium.

The area under management is approximately 200,000 square meters, and the Entity has approximately 1,300 employees on site. The facility includes on-site accommodation, recreation facilities, a canteen, a workshop, a laboratory and chemical storage.

The Entity is located in an industrial park developed by the local government. Most of its employees are from the local area. The Entity is in close contact with surrounding communities.

MATURITY RATINGS

A rating of maturity (low, medium or high) determined by the Auditor that provides a general assessment in terms of systems, Residual Risk and performance assigned to a Sustainability Component.

Maturity ratings are not a direct assessment of conformance to the Standard.

	GOVERNANCE	ENVIRONMENT	SOCIAL	COMBINED RATING
SYSTEMS	Medium	Medium	Medium	Medium
RISKS	Medium	Medium	Medium	Medium
PERFORMANCE	Medium	Medium	Medium	Medium
OVERALL	MEDIUM			

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Minor Non-Conformance	<p>The Entity has established a Laws and Regulations Control Procedure, and complies with national and international laws. It has detailed descriptions of the conduct of compliance audits and lists of all Applicable Law. The Entity's Environment, health and safety (EHS) Department and Administration Department are responsible for the legal law/regulation collection and assessment at least annually.</p> <p>However, some relevant laws/regulations are missing from the list.</p>
1.2 Anti-Corruption	Conformance	<p>The Entity has established an Anti-Corruption and Anti-Bribery Management Procedure. An Anti-Bribery management team has been established and regular assessments are undertaken. A Bribery risk assessment level standard has been established and employees have been regularly trained.</p> <p>The Administration Department summarises and evaluates the implementation of anti-Bribery work annually to determine whether the measures are sufficient and effective, and the Entity's status of Bribery risk.</p>
1.3a-e Code of Conduct	Conformance	<p>The Entity has formulated a Code of Conduct, which addresses environmental, social and governance (ESG) principles. The Entity undertakes an internal audit and management review annually to review the Code of Conduct. Changes are incorporated where there are any changes in law and/or business trends. Awareness of the Code of Conduct for staff is raised through various measures, including meetings and training. The Code of Conduct is publicly available at: http://www.anotech.cn/gszx</p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Minor Non-Conformance	<p>The Entity has implemented a Social, Environmental and Governance Policy, which is approved by the plant General Manager:</p> <p>http://www.anotech.cn/gszx</p> <p>The Entity has established the ASI Performance Standard Manual, including the Policies and procedures.</p> <p>However, the Policy is not communicated to Workers clearly and the Entity did not provide relevant training to Workers according to its plan.</p>
2.2a-c Leadership	Conformance	<p>A senior Management Representative has been appointed and the responsibilities and authorities are clearly defined. The Management Representative has overall responsibility and authority for ensuring conformance with the ASI Performance Standard and implementation and communication of the ESG Policies, as well as having sufficient authority to provide needed resources for the implementation, maintenance and improvement of Management Systems.</p>
2.3a Environmental and Social Management Systems - Environmental	Conformance	<p>The Entity has implemented and documented an Environmental Management System and holds a valid ISO 14001:2015 certificate.</p>

CRITERION	RATING	COMMENT
2.3b Environmental and Social Management Systems – Social	Conformance	<p>The Entity has developed and implemented an integrated Management System. The Entity has obtained ISO 14001:2015 and ISO 45001:2018 certificates.</p> <p>Also, an SA8000 Social Management System and ASI Management System are established. Internal audits and management reviews are conducted annually to ensure the effectiveness of the ASI Management System.</p>
2.4a-e Responsible Sourcing	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to the responsible sourcing requirements. The Responsible Sourcing Policy is reviewed at least every five years or after any changes to the Business that alter Material risks. The Entity has conducted supplier assessments and undertakes annual assessments of suppliers. The purchasing Policies are available at:</p> <p>http://www.anotech.cn/gszx</p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	<p>This Criterion is not applicable as there have been no New Projects or Major Changes since the Entity became an ASI Member, and none are planned. In case of New Projects or Major Changes, environmental, social, cultural and Human Rights Impact Assessments, including a gender analysis will be carried out as a part of mandatory reviews of project documentation by responsible state bodies.</p>
2.6a-h Human Rights Impact Assessment	Not Applicable	<p>This Criterion is not applicable as there have been no New Projects or Major Changes since the Entity became an ASI Member, and none are planned. In case of New Projects or Major Changes, environmental, social, cultural and Human Rights Impact Assessments, including a gender analysis will be carried out as a part of mandatory reviews of project documentation by responsible state bodies.</p>
2.7a-f Emergency Response Plan	Conformance	<p>The Entity holds valid ISO 14001 and ISO 45001 certificates. The Entity has developed and implemented Emergency Response Plans that are reviewed every five years, or after any changes to the Business that alter the nature or scale of emergency incident risk in accordance with legal requirements. Personnel training and drill records were verified during the audit. The Emergency Response Plan is publicly available on the website:</p> <p>http://www.anotech.cn/gszx</p>
2.8a-d Suspended Operations	Conformance	<p>The Entity has developed a Business resilience plan for suspending or significantly altering operations due to conflict, pandemics, natural disasters, cyber-attack and others. This plan was successfully implemented during the COVID-19 pandemic conditions and demonstrated the readiness of the Entity to adapt to factors outside its control, and the adequacy of its resources.</p>
2.9a-b Mergers and Acquisitions	Conformance	<p>The Entity has established a Mergers and Acquisitions Management Procedure. Until now, no mergers and acquisitions have occurred.</p>
2.10a-b Closure, Decommissioning and Divestment	Conformance	<p>Currently, there are no planned closure, decommissioning and divestment activities. When applicable, activities around closure, decommissioning and divestment will be driven by Corporate functional teams and involve conducting a review of environmental, social and governance consequences and consultation, where</p>

CRITERION	RATING	COMMENT
		possible, with the participation of Affected Populations and Organisations.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity has developed an annual Sustainability Report that describes their sustainability approach, and summarises their environmental and social impacts, available at: http://www.anotech.cn/gszx
3.2 Non-compliance and Liabilities	Conformance	There are no non-compliance or liabilities recorded in the Entity's Sustainability Report. Per the government-related and non-government websites no such case of non-compliance or liabilities was raised by government agencies: https://www.gsxt.gov.cn https://www.qcc.com
3.3a-c Payments to Governments	Conformance	The Entity only makes, or has made on its behalf, payments to governments on a legal and/or contractual basis. Payments to governments are transparently reported in their Annual Financial Audit Report, also with tax payment certificates available. This information is available in the Sustainability Report, available at: http://www.anotech.cn/gszx
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has established and operated a Stakeholder Complaints, Grievances and Requests Procedure, which has been formulated to publicise the Entity's contact telephone number, email address, suggestion box and other information to Stakeholders by means of the public board, accepting information inquiries, complaints and appeals from all parties: http://www.anotech.cn/gszx The Human Resources Department tracks requests and complaints and has an appropriate resolution mechanism.
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to the Life Cycle Assessment (LCA) requirements. During the audit, LCAs for all related Products were complete according to the Entity's LCA management procedure and the LCA report indicates that the defined procedures and processes are followed accordingly. Refer to: http://www.anotech.cn/gszx
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity has provided adequate cradle-to-gate LCA information on its Aluminium Products. The LCA focuses on the environmental life cycle impacts of these Products and was conducted in accordance with ISO 14040 and ISO 14044 to advance consistency and comparability of assessments. LCA studies are available upon customer request. The Life Cycle Assessment Report is available at:

CRITERION	RATING	COMMENT
		http://www.anotech.cn/gszx
4.2 Product Design	Conformance	The Entity has established and implemented a Product Design Procedure that integrates relevant objectives in the design and development process for Products to enhance sustainability, including the environmental life cycle impacts of the End Product.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has minimised the generation of Aluminium Process Scrap within its operations and targets 100% of scrap for collection, recycling and/or re-use. The Entity has a scrap and Dross classification and management procedure to classify the different kinds of Aluminium scrap. Scraps are classified and separated based on alloys and sent to various smelters. Related records are kept for review.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.4d Collection and Recycling of Products at End of Life	Conformance	<p>The Entity has developed a recycling strategy that includes specific timelines, activities and targets. And the Entity is communicating with its main customer on how to improve the recycling rate of Products at End of Life.</p> <p>There are no complete local, regional or national collection and recycling systems for Aluminium scrap in China. The Entity's Aluminium production waste is entrusted to a local company for remelting and recycling. The Entity is working with the customer to decide how to improve the recycling rate of Products at End of Life. Recycling contracts with customers to collect Products at End of Life and related recycling records are kept.</p>
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	<p>The Entity has accounted for and publicly disclosed its Material Greenhouse Gases (GHG) emissions and energy use by source on an annual basis on its website:</p> <p>http://www.anotech.cn/gszx</p> <p>The GHG emission data are checked by a Third Party and the Low Carbon Manufacturing Programme (LCMP) report is provided.</p>
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3a-e GHG Emissions Reduction Plans	Minor Non-Conformance	The Entity has established a GHG emissions reduction target covering five years. The main strategy is to reduce unnecessary electricity consumption and increase the ratio of green energy. The Entity

CRITERION	RATING	COMMENT
		<p>reviews the reduction plan annually or as a result of any changes to the Business that alter baselines or targets.</p> <p>The reduction target can be accessed via the following link: http://www.anotech.cn/gszx</p> <p>However, the GHG Emissions Reduction Pathway is not consistent with a 1.5°C warming scenario and does not include an 'end point' target for 2050.</p>
5.4 GHG Emissions Management	Conformance	The Entity has established a GHG Management Procedure and Emissions Source Identification Table to monitor the GHG emissions and achieve performance aligned with the GHG Emissions Reduction Plan and targets developed.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	<p>The pollutants in the air emissions are quantified in the Environmental Impact Assessment report. Treatment facilities are built and used. Emissions to Air are monitored quarterly, and meet the local legal emission limit. The Entity has implemented plans to minimise exposure to, and impacts from emissions, available at: http://www.anotech.cn/gszx</p>
6.2a-g Discharges to Water	Conformance	<p>Discharges to Water are covered and managed within the Environmental Management System. The Entity has established water reduction targets and established a related plan to minimise adverse impacts. Wastewater monitoring reports indicate that major pollutants were monitored, and monitoring results confirm that major pollutants meet the local legal discharge limit.</p> <p>The Entity has implemented plans to minimise exposure to and impacts from Discharges to Water, available at: http://www.anotech.cn/gszx</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has conducted regular Spills and Leakages assessments with leak risk factors listed. No high-risk situations are identified and the Entity has taken preventive action or implemented improvement programs for the potential risks identified. The assessment and management plan for Spills and Leakages is defined in the Environmental Management System and addresses the control measures in the risk factors list. Major Spills and Leakages are handled and communicated by the Entity's Emergency Response Team. The Leakage Management Plan is reviewed at least annually, and is available at: http://www.anotech.cn/gszx</p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The Emergency Response Plan and response guide define how to dispose of and report Spills. If there is a Spill, the Emergency Response Team would follow the response process. Drills are conducted annually to ensure the process is up to date. No Spills have occurred in the past few years. The Emergency Response Plan and response guide defines that the Entity will report Spills to the local authorities and impacted units and people immediately and disclose the Spill and remedial actions in the annual Continual Development Report, which is available upon request.</p>

CRITERION	RATING	COMMENT
6.5a-c Waste Management and Reporting	Conformance	<p>The Entity has an ISO 14001 certified Environmental Management System. The Waste Management Procedure defines the processes to collect and dispose of waste. The Entity has continual improvement targets to reduce the waste generation per unit. The targets are reviewed quarterly by the management team.</p> <p>The annual quantities of Hazardous and Non-Hazardous Waste generated by the Entity and their disposal methods are reported on the Entity's webpage:</p> <p>http://www.anotech.cn/gszx</p>
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity undertakes water-related risk analysis, including a water balance, to determine and map the source and type of water it draws and uses. The Entity has a water balance statistical data table for 2022, water resources management goals and plans, and a water balance chart.</p> <p>The Entity has conducted water risk assessments, which considered the Entity's industrial park location, nearby lands and waterways risk in their Area of Influence. Due to the nature of the Product and production processes and the Entity's closed loop water management systems, the level of water-related risk was found to be low. The water risk assessments can be accessed at:</p> <p>http://www.anotech.cn/gszx</p>
7.2a-e Water Management	Not Applicable	This Criterion is not applicable as there were no significant water-related risks identified in the Entity's Area of Influence.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has established procedures for the protection of biodiversity. A biodiversity risk assessment report has been prepared. The Entity is located within an industrial park developed by the local government, and there are no protected flora or wildlife in the area. The risk assessment determined there is no significant risk of biodiversity impact.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment – Priority	Not Applicable	This Criterion is not applicable, as the risk assessment documented the risk and potential impacts on Biodiversity and Ecosystem Services as low.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable, as the risk assessment documented the risk and potential impacts on Biodiversity and Ecosystem Services as low.

CRITERION	RATING	COMMENT
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable, as the risk assessment documented the risk and potential impacts on Biodiversity and Ecosystem Services as low.
8.4 Alien Species	Conformance	The Entity has stipulated relevant requirements for Alien Species in its ASI Performance Assurance Manual, including evaluating and controlling risks of Alien Species accidentally introduced by the Entity through operational activities. As per the biodiversity risk assessment report, the only source which could introduce Alien Species are the wooden pallets used for product packaging, which are fumigated before use.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity has stipulated relevant requirements in its ASI Performance Assurance Manual to commit to not exploring or developing New Projects or making Major Changes in World Heritage Properties. The Entity is located in an industrial park developed by the local government, and there are no World Heritage Properties in this area.
8.6a-d Protected Areas	Conformance	The Entity has stipulated relevant requirements in its ASI Performance Assurance Manual for Protected Areas. The Entity is located in an industrial park developed by the local government, and there are no Protected Areas in this area.
8.6e Protected Areas - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Minor Non-Conformance	<p>The Entity has established a Social, Environmental and Governance Policy, which includes a Policy commitment to respect Human Rights, respect employees' civil rights and eliminate Discrimination. The Policies are available for internal and external Stakeholders and are reviewed at least every five years or as a result of the annual EHS and social risks assessment. The Entity publishes the Policy on posts on-site and the website:</p> <p>http://www.anotech.cn/gszx</p> <p>The Entity has established a Human Rights Due Diligence Procedure, conducted Human Rights Due Diligence and issued a Human Rights Due Diligence Report. No adverse human rights impacts have been reported since its establishment and therefore remediation is not required.</p> <p>The Human Rights Due Diligence process is established and covers the supply chain. However, a sample of assessments determined that some suppliers have not completed the Human Rights Due Diligence assessment.</p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity has developed a Women's Protection Management Procedure that addresses the protection of women's rights and interests. The Entity clarified the legitimate rights of women and has implemented control measures to ensure their rights are met. The Gender Equality Project Development Plan is reviewed annually and available on the Entity's website:

CRITERION	RATING	COMMENT
		<p>http://www.anotech.cn/gsx</p> <p>No complaint has been received from women Workers. Women Workers know their rights.</p>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable, as there are no Indigenous Peoples within the Entity's Area of Influence.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable, as there are no Indigenous Peoples within the Entity's Area of Influence.
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is not applicable, as there are no Indigenous Peoples within the Entity's Area of Influence.
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is not applicable, as there are no Indigenous Peoples within the Entity's Area of Influence.
9.5a Cultural and Sacred Heritage - Identification	Conformance	The Entity has formulated a Cultural and Sacred Heritage Protection Management Procedure. Based on Construction Project Environmental Impact Report, prepared by the Jiangmen Environmental Science Research Institute, the Entity is located in the industrial park developed by the Jiangmen government and does not impact any cultural or sacred heritage sites and values.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable, as there are no cultural and sacred heritage within the Entity's Area of Influence.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable, as there are no New Projects or Major Changes causing displacement in the history of the Entity.
9.7a-h Affected Populations and Organisations	Conformance	<p>The Entity has formulated and implemented an Affected Populations and Organisations Management Procedure to commit to respecting the legal and customary rights and interests of Affected Populations and Organisations in their lands and livelihoods and their use of natural resources, while exploring opportunities to respect and support community livelihoods with the Industrial Economic Zone. There have been no complaints received from Local Communities.</p> <p>The Entity is in close contact with surrounding Communities. Most of its employees are from the local area. The Facility has installed environmental protection devices, such as an air emission treatment facility, to reduce the impact on the surrounding Communities from air emissions and boundary noise, which is also indicated in the environmental Impact Assessment report.</p> <p>The Entity supports local charities and participates in community public welfare activities, and has established a plan to support the surrounding Communities, available at:</p>

CRITERION	RATING	COMMENT
		http://www.anotech.cn/gszx
9.8a Conflict-Affected and High-Risk Areas - Strong management systems	Conformance	<p>The Entity has established a Responsible Sourcing Policy, responsibilities and resources, information gathering and supplier engagement, which is publicly disclosed at:</p> <p>http://www.anotech.cn/gszx</p> <p>Review of internet resources and interviews with management, employees and workshop chiefs confirmed the Entity did not demonstrate any contribution to armed conflict or Human Rights abuses in Conflict-Affected and High-Risks Areas.</p>
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity has conducted a risk-based Due Diligence process over their supply chain, which is embedded in the integrated Management System and the purchasing procedures. Processes did not identify any actual or potential risks.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Not Applicable	This Criterion is not applicable, as the risk-based Due Diligence process over the Entity's Aluminium supply chain is embedded in the integrated Management System and the purchasing procedures, and the processes did not identify any actual or potential risks.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	<p>The Entity has conducted a risk-based Due Diligence process over their supply chain, which is embedded in the integrated Management System and in the purchasing procedures.</p> <p>The Entity's supply chain and its Suppliers are reviewed annually. This audit against the ASI Performance Standard has audited the Entity's Due Diligence practices.</p>
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	<p>The Entity annually develops reporting documentation on their supply chain Due Diligence in accordance with requirements of the Conflict Minerals Policy and the Supplier Sustainability approach.</p> <p>Data from the reporting documentation, review of internet resources and interviews with employees and workshop chiefs did not demonstrate any contribution of the Entity to armed conflict or Human Rights abuses in Conflict-Affected and High-Risks Areas. The strategy documents are available at:</p> <p>http://www.anotech.cn/gszx</p>
9.9 Security practice	Conformance	The Entity has implemented a Security Services Management Procedure. The Entity also clearly defines the primary role of security guards, which is to protect people, property and/or assets and to respect Human Rights. All security guards have been trained in Human Rights requirements. To date, no security-related Human Rights violations have occurred.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Not Applicable	This Criterion is not applicable, as there are restrictions to the right to Freedom of Association and Collective Bargaining in China.
10.1d Freedom of Association and Right to	Conformance	There are laws that regulate the Freedom of Association and Collective Bargaining in China.

CRITERION	RATING	COMMENT
Collective Bargaining - Alternative means in context of Applicable Law		<p>The Entity has established and implemented a Freedom of Association and Collective Consultation Procedure to respect the right to Freedom of Association and Collective Bargaining. The Entity commits itself to respecting Workers' rights. A Labour Union and association for Workers is established in accordance with the legal requirement, to act on behalf of Workers regarding labour remuneration, working hours, rest and vacation, labour safety and health, vocational training, insurance and welfare.</p> <p>Although there are no Collective Bargaining Agreements in the company, the Entity respects the rights of Workers to Collective Bargaining and has a Policy of respecting rights related to Freedom of Association and Collective Bargaining.</p>
10.2a Child Labour	Conformance	<p>The Entity has established and implemented a Child Labour Rescue Policy. Young Workers are under special protection by Labour Standards Law and are not allowed to work in hazardous working conditions. The age of the candidate is verified during the hiring process through interviews and by checking identity cards. There is no Child Labour or young Workers at the Entity. The youngest Worker on site was 20 years old.</p> <p>The Entity communicates the requirement to Workers and its suppliers to ensure the legal requirements on Child Labour and young Workers are followed internally and throughout the supply chain.</p>
10.3a-c Forced Labour	Conformance	<p>The Entity has established and implemented a Prevention of Involuntary Labour Procedure, and commits itself and expects its suppliers to comply with the prohibition of Forced Labour, slavery and Human Trafficking.</p> <p>Based on Workers' (including on-site accommodation Workers) interviews, management interviews and document review, employees are not required to provide any form of deposit, Recruitment Fee or advances at any stage of employment. There is no restriction on Workers' freedom of movement at the site or the on-site accommodation. Workers are free to leave the factory when not engaged in work, and Workers move freely when needed to access basic liberties, such as toilet and drink breaks, and to access external medical facilities. No type of Forced Labour was found in the Entity.</p> <p>There are no foreign Migrant Workers at the Entity, all Workers are Chinese. The Entity does not provide any form of loans to Workers. In the labour contracts signed between the Entity and Workers, no term of Debt Bondage is found. The Workers' payslips indicate there is no illegal deductions.</p> <p>The Entity has a publicly available Modern Slavery Statement: http://www.anotech.cn/gszx</p>
10.4a-c Non-Discrimination	Conformance	<p>The Entity has implemented an Anti-Discrimination, Harassment and Abuse Procedure that effectively ensures equal opportunities and that it does not engage in or support Discrimination in hiring, salary, promotion, training, advancement opportunities or termination of any Worker. The Entity provides training to employees on the Discrimination policy during onboarding and annual re-calibration training.</p>

CRITERION	RATING	COMMENT
		Equal opportunities and a culture of non-Discrimination are evidenced via Worker interviews and results of the annual business conduct and conflict review.
10.5 Communication and engagement	Conformance	The Entity has developed and implemented an Employee Complaints Management Procedure. Open communication and direct engagement with Workers and their representatives regarding working conditions and resolution of workplace and compensation issues are ensured via regular meetings between the Labour Union and senior management, the grievance and complaints hotline and email, as well as operating procedures.
10.6a-g Violence and Harassment	Conformance	The Entity has and maintains a corporate Policy to prevent Harassment in the workplace, which excludes any kind of Violence and Harassment in the workplace. The Entity provides training on aspects of this Policy concerning the prevention of Harassment and countering Harassment and Discrimination. The Policy is available at: http://www.anotech.cn/gszx The Ethics and Compliance Integrity Line is available in all languages, and employees can report anonymously any cases of Violence and Harassment.
10.7a-c Remuneration	Conformance	All remuneration payments are documented and promptly paid to all Workers by bank transfer on the 20th of every month. Employees receive remuneration for working Overtime and on public holidays, rest days and at night. Employees receive a monthly pay slip with information on the calculation of the wage and any deductions such as taxes. All employees are paid wages higher than the fixed living wage in China.
10.8a-c Working Time	Minor Non-Conformance	The Entity has implemented an attendance and working hours system. Working hours are recorded and managed and Overtime is voluntary. Based on Worker interviews and document review, the total weekly hours do not exceed 60, and at least one day of rest in a week is guaranteed. Based on a review of the Voluntary Overtime Management Procedure and confirmation from Workers, Overtime is voluntary, and Workers can refuse to undertake Overtime hours. However, a minor non-conformance is raised as the monthly Overtime hours for selected Workers were over 36 hours, which exceeds the China Labour Law.
10.9a-b Informing Workers of Rights	Conformance	The Entity has provided information to Workers on their rights through local information systems including, electronic boards, public bulletin boards (located in every workshop), training, personal consultations and meetings.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has obtained a valid ISO 45001:2018 certificate from an accredited certification body (valid until January 2025). The Entity has established formal Policies for Occupational Health and Safety (OH&S) which are posted in the internal public areas.

CRITERION	RATING	COMMENT
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	The Entity has obtained a valid ISO 45001:2018 certificate from an accredited certification body. Performance indicators and comparative analyses of performance with peer Businesses and leading practices are published in the Sustainability Report, available at: http://www.anotech.cn/gszx
11.2 Employee engagement on Health and Safety	Conformance	The Entity has obtained a valid ISO 45001:2018 certificate from an accredited certification body (valid until January 2025). The Entity has established adequate and effective procedures on OH&S control and provides Workers with mechanisms including the safety committee, suggestion box, congress and irregular Worker interviews. The Entity maintains records of engagement.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	4 July 2023	Initial Certification Audit – Full Certification